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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc., et al.,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
IN SUPPORT OF DEFENDANT OTTO
TRUCKING LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS OPPOSITION TO
PLAINTIFF WAYMO LLC'S MOTION
FOR ORDER TO SHOW CAUSE**

Courtroom: 8, 19th Floor
Judge: Hon. William H. Alsup

I, Neel Chatterjee, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to file Under Seal Portions of its Opposition to Plaintiff Waymo LLC’s Motion for Order to Show Cause (the “Administrative Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Opposition	Highlighted Portions
Exhibits 1, 2 to the Declaration of Neel Chatterjee	Entire Documents

3. The highlighted portions of the Response include highly confidential, sensitive business information relating to the terms of Otto Trucking’s agreements and corporate structure. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that if this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

4. Exhibits 1 and 2 contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that if this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the

1 Opposition and supporting documents that merit sealing.
2

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct. Executed this 5th day of July, 2017 in Menlo Park, California.
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6 /s/ Neel Chatterjee
7 Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 5, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 5, 2017

/s/ Neel Chatterjee
Neel Chatterjee